

**MEMO ENDORSED**



Jarrett S. Charo – Of Counsel  
200 Vesey Street, 24th Floor  
New York, NY 10281  
P: (212) 595-6200 | F: (212) 595-9700  
Jchro@mizrahikroub.com  
www.mizrahikroub.com

March 1, 2022

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Centre St.  
New York, NY 10007

Re: *Contreras v. CWGS Group, LLC*; Case No. 1:21-cv-09100- VEC

Dear Judge Caproni:

We represent plaintiff Yensy Contreras (“Plaintiff”) in the above-referenced action. We submit this letter to respectfully request an adjournment of the initial conference set for March 11, 2022, at 10:00 a.m. as well as the deadline on March 3<sup>rd</sup> to submit the pre-conference joint submissions. Plaintiff requests this adjournment since Defendant has yet to appear or contact counsel for Plaintiff. Today, Plaintiff’s counsel has also reached out directly to former counsel of this Defendant as well the company themselves to try and make contact. Plaintiff requests 21 days from March 11<sup>th</sup> (the date until which Defendant’s answer is stayed) to obtain a Certificate of Default and to file an Order to Show Cause for Default Judgment if Defendant fails to appear. This is Plaintiff’s first request for such extension and as Defendant has not appeared, there has been no consent granted.

Thank you for your consideration in this matter.

Respectfully submitted,  
/s/ Jarrett S. Charo  
JARRETT S. CHARO

cc: All Counsel of Record (via ECF)

Defendant's time to answer, move, or otherwise respond to the Complaint is **Friday, March 11, 2022**. If Defendant fails to meet that deadline, Plaintiff must move for an order to show cause why default judgment should not be entered against Defendant, in accordance with this Court's Individual Practices, by no later than **Friday, March 25, 2022**.

The initial pre-trial conference, currently scheduled for Friday, March 11, 2022 at 10:00 A.M., and the parties' joint pre-trial submissions deadline are adjourned *sine die*. If Defendant answers the Complaint by the March 11, 2022 deadline, the Court will reschedule the initial pre-trial conference.

Plaintiff must serve a copy of this Endorsement on Defendant and file proof of service on the docket by no later than **Friday, March 4, 2022**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the printed name.

Date: March 1, 2022

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE